



State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Scott Walker, Governor
Theodore K. Nickel, Commissioner

Wisconsin.gov

November 22, 2017

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Advanced Via E-Mail

Mr. Thomas R. Hrdlick
Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-5306

Re: Form D by Hannover Finance, Inc. on behalf of The Omaha Indemnity Company (to be renamed Glencar Insurance Company)

Dear Mr. Hrdlick:

Based upon the Form D dated October 31, 2017, which was filed by Hannover Finance, Inc. on behalf of The Omaha Indemnity Company (to be renamed, Glencar Insurance Company), this Office declines to disapprove the following agreements:

1. Administrative Services Agreement by and among Glencar Underwriting Managers, Inc. and Glencar Insurance Company
2. Program Administrator's Agreement by and between Glencar Underwriting Managers, Inc. and Glencar Insurance Company
3. 90% Quota Share Reinsurance Agreement between Hannover Rück SE, as Reinsurer, and Glencar Insurance Company, as Ceding Company
4. Tax Allocation and Settlement Policy by and among Hannover Finance, Inc. and Glencar Insurance Company
5. Outsourcing Contract for Services in the Field of Asset Investment and Portfolio Management between Talanx Asset Management GmbH and Glencar Insurance Company

Please file copies of each of the executed agreements with this Office within 10 days following their execution.

If you have questions on this or any other matter in which I may be of some assistance, please call me at (608) 267-4388.

Sincerely,

Steven J. Junior
Insurance Examiner Supervisor
Bureau of Financial Analysis and Examinations

cc: Patrick P. Fee, Hannover Finance, Inc. (via e-mail only)
Mark R. Boetel, Mutual of Omaha Insurance Company (via e-mail only)